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July 20, 2023

VIA ECF

Honorable Nicholas G. Garaufis
United States District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Carlton Roman v. City of New York, et al.
22-cv-6681 (NGG) (CLP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing the defendants in this action. Defendants write to respectfully request a 30-day extension from July 28, 2023 to August 28, 2023 to file their reply papers in connection with their motion to dismiss. This is Defendants' second request for an extension of time to file their reply, the first of which was granted. Plaintiff's counsel, James Henning, does not consent to this request.

The reason for this request is that the parties are currently engaged in settlement negotiations and most recently, on July 18, 2023, attended a settlement conference with Magistrate Judge Pollak. At the conclusion of that conference, Magistrate Judge Pollak issued a recommendation and scheduled an additional date to meet for a settlement conference on July 27, 2023. Accordingly, it is the hope that this case may resolve next week and therefore, any reply would be unnecessary.

For all these reasons, and given that the undersigned is scheduled to be out of the office and country on a pre-scheduled vacation from July 31, 2023 – August 11, 2023, Defendants respectfully request an additional 30 days, from July 28, 2023 to August 28, 2023, to prepare and file their reply in further support of Defendants' Motion to Dismiss. Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Seema Kassab

Seema Kassab

Assistant Corporation Counsel

cc: All Counsel (By E.C.F.)